



Buena Vista Water Storage District

P.O. Box 756 • 525 N. Main Street
Buttonwillow, California 93206
Phone: (661) 324-1101 • (661) 764-5510
Fax: (661) 764-5053

DIRECTORS:

John Vidovich - President
Terry Chicca - Vice President
Jeof Wyrick - Secretary
John Cauzza
Larry Ritchie

STAFF:

Tim Ashlock – Engineer-Manager
Adam Sevier - Superintendent
Andrew Bell – Hydrographer
Angela Thompson – Executive Assistant
Marybeth Brooks - Controller

August 1, 2018

Patrick Pulupa, Executive Officer
Central Valley Regional Water Quality Control Board
1685 E Street
Fresno, CA 93706-2007

RE: Pesticide Evaluation Protocol Proposal – 2018 Update

Dear Mr. Pulupa:

The Buena Vista Coalition (BVC or Coalition) is submitting a "Pesticide Evaluation Protocol Proposal – 2018 Update" (Proposal) in response to monitoring requirements described in the Monitoring and Reporting Program required by Waste Discharge Requirements, General Order for Growers in the Tulare Lake Basin that are Members of a Third-Party Group, Order No. R5-2013-0120 (General Order). In November of 2016 the Executive Officer issued a Pesticides Evaluation Protocol (Protocol) to be used by coalition groups to determine appropriate pesticides to monitor under the Monitoring and Reporting Program for surface water. This proposal utilizes pesticide use data from 2014, 2015 and 2016.

As described in the Protocol coalitions must annually update and submit a list of pesticides to be monitored using the most recent three years of pesticide use data. Pesticide use data are required to be evaluated to create monitoring prioritization based on aquatic life and human health reference values, as well as evaluating existing monitoring data, environmental fate factors, and availability of analytical methods. The resulting list is intended to be watershed specific and updated annually with the submittal of the Surface Water Monitoring Plan Update. Monitoring Plan Updates are due 60 days prior to the start of the coalition's monitoring year. The BVC monitors surface water using a water year which begins on October 1st and ends September 30th, therefore the Monitoring Plan Updates and Proposals are due annually on August 1. Described below is the process by which the BVC utilized the Protocol to determine pesticides to monitor in the 2019 water year.

Evaluation Process

The steps outlined in the Protocol were followed to analyze relevant pesticide use records within the BVC boundary area. Pesticide application data were obtained through the Department of Pesticide Regulation's (DPR's) California Pesticide Information Portal (CalPIP) for Tulare County for the years 2014 through 2016. Only pesticide use data in BVC surface water monitoring areas were selected from available CalPIP data. Pesticide application records for the watersheds were filtered to only chemicals included in the Executive Officer List of Pesticides for Consideration (Pesticide Evaluation Protocol, Attachment A).

The application records defined the total cumulative use for each month and annual use averaged by month in pounds of chemical, as well as the quantity of degradates and impurities resulting from application. These application results were grouped and ranked relative to aquatic life reference values and the percent annual application per month. Available surface water monitoring data were queried for the pesticides applied to determine if detections greater than 10% of the reference value were found in the watershed. Environmental fate of identified pesticides was reviewed to define those unlikely to be found in the water column. Site and chemical specific considerations were reviewed, along with the availability of chemical analysis methods to determine pesticides which may not require monitoring.

The monitoring proposal includes and prioritizes pesticides relevant to each defined step in the Protocol. The list of proposed pesticides to monitor is defined in Table 1 and illustrates months for which applications were significant relative to aquatic life reference values, and therefore monitoring is anticipated to occur. The emailed spreadsheet contains worksheets detailing monitoring decisions for each evaluated pesticide and what criteria were applied for each exemption.

As the Protocol was completed several decisions were made to determine exemptions, which are clarified below:

- CalPIP data was clipped to surface water monitoring areas (using GIS) to select sections within watershed or sub-watershed boundaries. Watersheds were determined using topographical information to delineate lines of highest elevation. For areas with minimal elevation variance, other factors such as physical barriers and intersecting waterways (canals or ditches) were used to determine the area of influence within the sub-watershed boundary.
- The prioritization for human health reference values was omitted. The Water Quality Control Plan for the Tulare Lake Basin (Basin Plan) identifies the beneficial uses which apply to surface waters (Basin Plan, Table II-1). The waterbody monitored by the BVC is classified as "Valley Floor Waters" which are not designated as having a Municipal and Domestic Supply beneficial use.

The monitoring proposal includes and prioritizes pesticides relevant to each defined step of the Protocol. For the 2019 water year the BVC will monitor the Main Drain sub-watershed for assessment parameters. Table 1 details the proposed list of pesticides to be monitored in the 2019 Water Year. Upon approval of this proposal, the BVC will begin implementation of the proposed monitoring. The BVC intends to continue to work with RWQCB staff to determine how to appropriately incorporate previously collected surface water monitoring data to establish pesticides to be monitored.

Please contact our office if you or your staff have any questions.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel or represented Members properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fine and imprisonment for violations."



Tim Ashlock
Buena Vista Coalition

Monitoring Proposal	Column Labels												Grand Total
Row Labels	JAN	FEB	MAR	APRIL	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC	
ACETAMIPRID								X					1
COPPER		X	X	X	X	X						X	6
IMIDACLOPRID		X	X	X	X								4
PENDIMETHALIN	X	X	X	X		X					X	X	7
PYRACLOSTROBIN				X	X	X							3
BIFENTHRIN			X	X	X	X	X	X	X	X			8
CARBARYL		X	X	X	X	X	X	X	X				8
CHLOROTHALONIL		X	X	X	X	X							5
CHLORPYRIFOS		X	X	X		X	X	X	X	X	X		9
CLOTHIANIDIN						X	X		X				3
CYFLUTHRIN		X	X	X	X	X	X	X					7
CYPERMETHRIN	X		X	X	X	X	X					X	7
DICHLORVOS					X	X							2
DIMETHOATE		X	X		X	X	X	X		X	X		8
LAMBDA-CYHALOTHRIN	X	X	X	X	X	X	X	X					8
MALATHION		X	X	X	X								4
METHOMYL		X	X	X	X		X	X	X	X	X		9
OXYFLUORFEN	X	X	X	X	X	X	X	X	X	X	X	X	12
PARAQUAT DICHLORIDE	X	X	X	X	X	X	X	X	X	X	X	X	12
PERMETHRIN				X	X	X	X	X	X				6
S-METOLACHLOR			X	X	X								3
TRIFLURALIN		X	X	X									3
ESFENVALERATE	X					X				X		X	4
FLUMIOXAZIN	X	X										X	3
ORYZALIN	X	X											2
FENPROPATHRIN					X	X			X				3
DIURON									X				1
DIAZINON			X									X	2
LINURON			X									X	2
Grand Total	8	16	19	18	18	18	12	11	10	7	6	9	152